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November 2, 2020

The Honorable Katherine Polk Failla  
United States District Judge  
U.S. District Court, Southern District of New York  
40 Foley Square  
New York, NY 10007

## VIA ECF

Re: *In re Application of the Reporters Committee for Freedom of the Press to Unseal Certain Search Warrant Applications and Related Judicial Documents*, 18-MC-320 (KPF)

Dear Judge Failla,

Petitioner Reporters Committee for Freedom of the Press (“Reporters Committee”) and the U.S. Attorney’s Office for the Southern District of New York (“USAO”) write in response to the Court’s orders dated January 10, 2019, June 18, 2019, August 6, 2019, January 30, 2020, April 1, 2020, May 29, 2020, and August 3, 2020 (Docket Nos. 19, 21, 23, 25, 27, 29, 31), directing the submission of a joint status letter regarding the above-captioned case.

In the last status update to the Court, the Reporters Committee and the USAO informed the Court that the Clerk’s Office anticipated starting internal testing of electronic filing capacity for sealed applications in magistrate judge (“MJ”) matters this fall, with the goal of having it completed by the end of 2020.

Since our last update, the Clerk’s Office set up a test database for ECF filing of sealed materials, consistent with the proposal previously discussed in updates to the Court. The Clerk’s Office will hold a training for certain USAO staff on November 4, 2020, to familiarize the USAO with the test database, and to allow USAO staff to initiate test filings in order to assist the Clerk’s Office in identifying any potential inadvertent disclosures or other glitches. The Clerk’s Office and the USAO intend to confer bi-weekly during the test phase, which the Clerk’s Office anticipates will last at least until the end of the calendar year.

The USAO intends to keep the Reporters Committee apprised of any updates in the interim, and the parties expect to be able to provide a further status update to the Court by February 2, 2021.

Accordingly, the Reporters Committee respectfully requests that the stay in this case be extended to and including February 2, 2021. The

Reporters Committee and the USAO will provide a further status update to the Court no later than February 2, 2021.

Respectfully submitted,

/s/ Katie Townsend

Katie Townsend

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